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Filed Via ECF

June 30, 2021

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: U.S. v. Jonathan Rodriguez, et al
S-15 Cr 445 (PAE)**

Dear Judge Engelmayer:

The undersigned has been appointed by the Court to assist in the representation of defendant Jonathan Rodriguez in his pro se application to the Court for Compassionate Release pursuant to 18 U.S.C. § 3582(c). I respectfully move, nunc pro tunc, that the Court extend the deadline for filing an amended application for Compassionate Release until July 30, 2021.

To begin with, I apologize to the Court and counsel for allowing the Court's scheduling Order to go unheeded. It was never my intention to disregard the Court's Order and although I attempt to keep a tight rein on my calendar, the Court's Order was not docketed on my schedule and the dates set by the Court were not complied with. Again, I apologize to the Court.

On or about May 28, 2021, the Court re-appointed the undersigned to represent Mr. Rodriguez on his application for Compassionate Release and further, to file a memorandum in support thereof on or before June 18, 2021. Since the date of the re-appointment, the undersigned has communicated with Mr. Rodriguez about his need to file an application for compassionate release with the Warden of Gilmer FCI, the facility where he is currently housed and to supply the undersigned with copies of his BOP medical and disciplinary records. Authorizations were sent to Mr. Rodriguez for his signature. To date, Mr. Rodriguez's medical records have been received by this office but not his Progress Report or his disciplinary paperwork. On June 16, 2021, the undersigned communicated with the Executive Assistant at Gilmer FCI requesting his/her assistance in being provided with the requested reports. These documents have yet to be received by this office.

Honorable Paul A. Engelmayer
United States District Judge

Re: U.S. v. Jonathan Rodriguez, et al
S-15 Cr 445 (PAE)

June 30, 2021

Page 2.

The undersigned moves, nunc pro tunc, for an extension of time until July 30, 2021, in which to file a supplemental application for Compassionate Release on behalf of Mr. Rodriguez. The undersigned believes that the extension of time will permit the undersigned to receive a response from the Warden of Gilmer FCI on Mr. Rodriguez's administrative request for compassionate release, will permit the undersigned to receive and review both the disciplinary records and medical records of the defendant and file a memorandum in support of the defendant's application.

I thank the Court for its consideration of the instant application.

Respectfully submitted,

/s/ *Bruce D. Koffsky*
Bruce D. Koffsky

cc: All Counsel of Record

Granted. The Government's response to Mr. Rodriguez's memorandum is due by August 6, 2021.

SO ORDERED.



June 30, 2021

PAUL A. ENGELMAYER
United States District Judge